

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FILED

FEB 11 2008

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MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA,
Plaintiff,

v.

DANIEL HILL, et. al.,
Defendants.

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) No. 1:07-CR-00843
) Judge: Honorable Sidney I.
) Schenkier
)
)
)

MOTION FOR RECONSIDERATION FOR PRETRIAL RELEASE

Defendant, DANIEL HILL, by his attorney, Joan A. HillMcClain, respectfully moves this Honorable Court for reconsideration the detention Order, entered by Magistrate Judge Sidney I. Schenkier on December 18, 2007, pursuant to 18 U.S.C. Sections 3142 and 3145. In support thereof, Daniel Hill states:

1. On December 18, 2007 Mr. Hill appeared before this Honorable Court after his arrest. Defendant waived his detention hearing without prejudice. This Court entered an order denying defendant pretrial release at that time.

2. Defendant respectfully requests that This Court allow him to be release during pretrial.

3. Defendant was charged along with fifteen (15) other codefendants in a multiple count complaint. The following codefendants have been granted release during pretrial: Lance Olden (\$4,500.00 recognizance bond); Brian Wilbourn (\$200,000.00); Senecca Williams (\$5,000.00 recognizance bond); Terrence Sewell (\$100,000.00

recognizance bond); Reginald Booker (\$4,500.00 recognizance bond); and Lonnie Mack (\$4,500.00 recognizance bond).

4. Defendant has strong community ties to Chicago, Cook County, Illinois. Defendant parents, siblings, children and extended family reside in Illinois. Defendant's mother is ill. Defendant is not a flight risk.

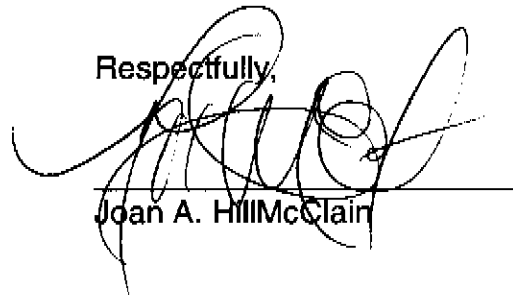
5. Defendant is currently being held in the Jerome Combs Detention Center in Kankakee, Illinois.

6. Defendant is a good candidate for pretrial release on bond or house arrest to ensure the defendant's appearance during the pendency of the case herein.

CONCLUSION

For all of the reasons set forth herein, it is respectfully asked of this Honorable Court to enter an Order allowing Daniel Hill to be released bail and impose any conditions that this Court deems are necessary herein during the pendency of this matter.

Respectfully,

A handwritten signature in black ink, appearing to read 'Joan A. HillMcClain', is written over a horizontal line. The signature is stylized with large, looping letters.

Joan A. HillMcClain
Attorney for Daniel Hill
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